

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLYLE AVIATION MANAGEMENT LIMITED,
ACCIPITER INVESTMENTS AIRCRAFT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, ACCIPITER HOLDINGS DAC,
MAVERICK AVIATION HOLDINGS LTD.,
MANCHESTER AVIATION FINANCE S.à r.l.,
WELLS FARGO TRUST COMPANY, N.A., not in
its individual capacity but solely in its capacity as
OWNER TRUSTEE, UMB BANK, N.A., not in
its individual capacity but solely in its capacity
as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Defendant.

Case No.: 1:23-cv-04774 (PAE)

MOTION AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed declaration of Emily Werkmann, and subject to the approval of the Court, Emily Werkmann hereby withdraws as counsel for Plaintiffs and shall be removed from the CM/ECF notification list in the above-captioned matter. Jed M. Schwartz and Samantha Lovin of Milbank LLP will continue to represent Plaintiffs in this action.

Dated: February 14, 2024
New York, New York

MILBANK LLP

By: /s/ Emily Werkmann
Emily Werkmann
55 Hudson Yards
New York, New York 10001
(212) 530-5000
EWerkmann@milbank.com

Attorneys for Plaintiffs

SO ORDERED: _____

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLYLE AVIATION MANAGEMENT
LIMITED, ACCIPITER INVESTMENTS
AIRCRAFT 4 LIMITED, VERMILLION
AVIATION (TWO) LIMITED, ACCIPITER
HOLDINGS DAC, MAVERICK AVIATION
HOLDINGS LTD., MANCHESTER
AVIATION FINANCE S.à r.l., WELLS
FARGO TRUST COMPANY, N.A., not in its
individual capacity but solely in its capacity as
OWNER TRUSTEE, UMB BANK, N.A., not in
its individual capacity but solely in its capacity
as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Defendant.

Case No.: 1:23-cv-04774 (PAE)

DECLARATION OF EMILY WERKMAN

EMILY WERKMAN, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am associated with the law firm Milbank LLP, counsel for Plaintiffs in the above-captioned action. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am withdrawing as counsel for Plaintiffs.
2. Jed M. Schwartz and Samantha Lovin of Milbank LLP will continue to represent Plaintiffs in this action.
3. My withdrawal will not delay the matter or prejudice any party.

4. I am not asserting a retaining or charging lien.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2024
New York, New York

/s/ Emily Werkmann
Emily Werkmann